

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(consolidated cases)

DEFENDANT CLIFFORD TATUM'S RULE 26(a)(3) PRETRIAL DISCLOSURES

Defendant Harris County Elections Administrator, Clifford Tatum, pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, makes his pretrial disclosures. Defendant Tatum reserves the right to amend his disclosures to include witnesses or exhibits that he could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures made under Rule 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses Defendant Tatum expects to present:

None

Witnesses Defendant Tatum will call if the need arises:

None.

The following witnesses will testify, if necessary, regarding attorneys' fees and costs:

Tiffany S. Bingham
Jonathan G.C. Fombonne
Harris County Attorney's Office

1019 Congress, 25th Floor
Houston, Texas 77002

B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, Defendant Tatum reserves the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii). *See* Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits Defendant Tatum expects to offer:

None.

Documents and other exhibits Defendant Tatum will offer if the need arises:

None.

Dated: July 28, 2023

Respectfully submitted,

/s/ Tiffany S. Bingham
Christian D. Menefee
Harris County Attorney
Texas Bar No. 24088049
Christian.Menefee@harriscountytx.gov
Jonathan G.C. Fombonne
First Assistant Harris County Attorney
Texas Bar No. 24102702
Jonathan.Fombonne@harriscountytx.gov
Tiffany S. Bingham
Managing Counsel
Texas Bar No. 24012287
Tiffany.Bingham@harriscountytx.gov
OFFICE OF THE HARRIS COUNTY ATTORNEY
1019 Congress Plaza, 15th Floor
Houston, Texas 77002
Telephone: (713) 274-5101
Facsimile: (713) 755-8924

*Attorneys for Defendant CLIFFORD
TATUM, in his Official Capacity as Harris
County Elections Administrator*

CERTIFICATE OF SERVICE

I certify that on July 28, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Tiffany S. Bingham
TIFFANY S. BINGHAM